

# **Exhibit 1**

## **Declaration of Twana Ahmed**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Twana Ahmed,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO. 4:23-cv-02923
	§	
vs.	§	Jury Demanded
	§	
Universal Protection Service, LP d/b/a	§	
Allied Universal Security Services,	§	
	§	
<i>Defendant.</i>	§	

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DECLARATION OF TWANA AHMED

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1. My name is Twana Ahmed. The facts and statements that I make in this declaration are true and accurate to the best of my recollection. Unless otherwise stated or apparent from my testimony, I have personal knowledge of the facts and statements that I make in this declaration. I was told that “personal knowledge” means that I personally witnessed or experienced something using one or more of my senses, like sight, hearing, smell, or touch. I was also told that “personal knowledge” includes how I feel.
2. When I talk about accurate copies of documents, pictures, videos, or images in this declaration, I’m talking about the documents, pictures, videos, or images without the things that I understand an attorney or law firm might add: (1) letters and numbers at the bottom — what I’m told are called “bates-labels” or “bates-numbers,” (2) redactions, (3) highlighting, and (4) blue boxes around text, photos, or images. Unless otherwise stated or apparent from my testimony, any bates-labels, redactions, highlighting, or blue boxes were not part of the originals.
3. One of my attorneys added the captions and typeface in this declaration. The captions are not part of my testimony.

### **Basics: race, religion, national origin, work experience**

4. I am a Middle-Eastern, Kurdish male. I am over 18 years old. I am originally from Iraq; I was born in Iraq. I am Muslim. I practice Islam. I have been a Muslim since I was born.
5. I became a United States resident in 2012. I speak a few different languages. My first language is Kurdish. I am also fluent in Arabic. I learned to speak some English as a young boy around 10 or 11 years old. In the past I have worked with the United States military translating verbal conversations from Arabic or Kurdish to English. When I speak English, sometimes words are difficult for me to say because of the accent. I've been told before by several people that I have an accent when speaking English. Writing in English is more difficult for me. It takes me some time to write and read in English. For writing in English, I sometimes use an app to help me write things by just speaking into the microphone. For example, I use a note app on my phone and speak what I would like to write down in English, then the app will write down what I am saying. It takes a while. And it is not always spelled the right way. Or if it does not understand what I am saying, sometimes the app writes down other words. Other times I use google translate (or something like that) to translate spoken and written words from Arabic to English.
6. I have a lot of experience working as a security professional. After moving to the U.S, I worked as a security officer for Spartan, Eagle Security, and USAPD Security. I was also trained by the United States Army for security detail.

### **Allied Universal: hiring and knowledge of Twana Ahmed's race, religion, and national origin**

7. In 12/2021 I applied for a job with Allied Universal. I was scheduled for an interview on 12/13/2021 at an office. An accurate copy of the email scheduling me for the interview is attached as exhibit A.
8. When I got to the location listed in the email, I told the receptionist that I was there for an interview. The receptionist told me Allied was having a hiring event at a different location and they would do the interview over there. She gave me the address, which was for a Marriott hotel off of Westheimer Road in Houston. I went to the hiring event that same day.
9. When I got to the hiring event, I went to a table where there were two ladies sitting. One of the ladies, who told me she was from the Philippines, asked me what kind of license I had. She started reviewing my driver's license and security license. At

the time I had a Texas Commissioned Armed Security License. I told her that I speak a few different languages. She told the other lady, something like, “He has everything, we need to put him with the Elite.” I remember hearing that they were short of staff and needed people fast, especially because of the busy holidays coming up.

10. I learned the “Elite” security officers are armed security officers for H-E-B owned grocery stores. And that the Elite security officers work at H-E-B, and the other grocery stores that H-E-B owns like Central Market, Mi Tienda, and Joe V’s. That is the job that I was offered and I agreed to work. During my time working for Allied I worked at different H-E-B locations, and I worked at the Central Market by the Galleria, and Mi Tienda on Little York Road in Houston.
11. Then, the other lady told me to stand against the wall and she took a full body picture of me. She called the account manager at the time and told him that she had sent him a picture of me. She told me something like, “They want you. We need you to start as soon as possible.” That was about it for the interview. Based on what I saw and heard, it seemed to me they just wanted anyone that had a Texas Commissioned Armed Security License (“security license”).
12. After that, either that day or a couple of days later, I was at the same hiring event and I was taken to a room with a woman who I now know to be Catherine Barnes (Allied’s Human Resources Coordinator), and another person. I sat down and they had paperwork and a lot of computers there. Probably 10-15 computers. Catherine handed me a lot of paperwork and told me, “Sign here, sign here,” without explaining what any of the paperwork meant. Someone told me not to worry about reading the paperwork. This was Catherine Barnes’ email signature during the time that I was working for Allied:





13. I understand that Allied says they did not know my race or ancestry, my religion, or where I was born. These are examples of ways that they did know:
14. My first language is not English. When I speak English, sometimes cannot pronounce some words or do not know some words. I speak with a different accent. Some words are hard to say because of the accent.
15. I remember filling out a form that had to do with my security license. The form asked for my country of birth, and I listed Iraq. This is what the top of the form looks like:

**Texas Department of Public Safety**  
Regulatory Services Division  
[www.dps.texas.gov](http://www.dps.texas.gov)

**PRIVATE SECURITY**

**EMPLOYEE INFORMATION UPDATE**

**APPLICATION INFORMATION**

Submission of an employee information update form (PSP-14) affiliates the individual with the new employer, it does not generate a new pocket card or renew the individual license.

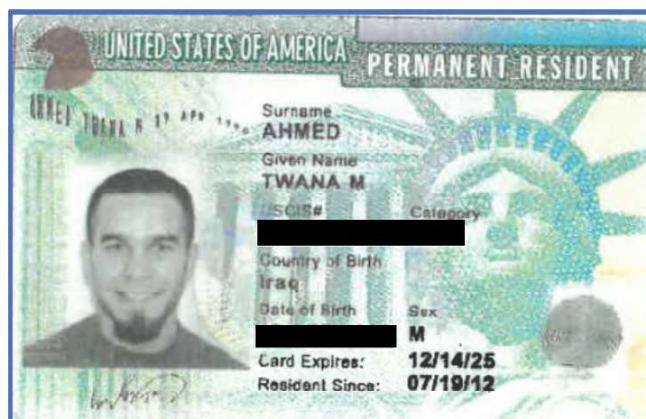
THE ABOVE SPACE IS RESERVED FOR OFFICE USE ONLY

**APPLICANT INFORMATION (EMPLOYEE INFORMATION)**

Applicant Last Name	Applicant First Name	Middle Initial
Applicant Social Security Number	Applicant Email Address	
Date Of Birth	Country Of Birth	State
<input type="checkbox"/> State Issued DL	<input type="checkbox"/> USA Passport	DL/ID, Passport Or Military ID Number
<input type="checkbox"/> State Issued ID	<input type="checkbox"/> Military ID	DL/ID Issuing State
Home Address	County	

An accurate copy of the empty form is attached as exhibit B.

16. I also remember that someone copied my permanent resident card. It also lists my country of birth as Iraq. An accurate copy of my resident card is shown below and also attached as exhibit C.



17. About a week after I started working at H-E-B, Allied's Human Resources Coordinator Catherine Barnes asked me to come in and fill out some forms. I met with her on 12/29/2021. I remember that one of the forms I filled out was the same Texas Department of Public Safety security license form that I filled out before. The form that I filled out is attached as exhibit D. I also had to re-fill an I-9 form to correct an error with my date of birth. Catherine also copied my permanent resident card again at that time. Both the Texas security license form and my permanent resident card list my country of birth as Iraq.
18. Based on what I observed, it is my opinion that Allied knew that I was Muslim. For several reasons. Because of my name. Because of where I was born, in a country known for having a population that is almost all Muslim. Because of my Middle-Eastern accent. ,And because I told them, my supervisor and my manager that I needed to keep my beard for religious purposes. Based on my experience, most people know that it is part of practicing Islam for men to keep a beard.

**Allied Universal: rushes to put armed security guards out in the field: no discrimination and harassment training.**

19. There were other people in the hiring event room also filling out paperwork and on the computers. I don't remember exactly what they did on the computer, but some of it was asking for my bank account, address, and phone number. There was no actual training that day. There was nothing on the computer about harassment or discrimination, or anything like that. If I had any problem filling out the information, Catherine would tell me what to do.
20. I signed everything. I did not read everything, but I did notice part of the paperwork included some certificates. I believe they were the certificates attached as exhibit E.
21. The certificates say that I completed a new employee orientation and discrimination and harassment training on 12/15/2021. I did not complete any orientation that day. For the entire time that I worked for Allied, I do not remember Allied or anyone from Allied ever giving me any training on discrimination or harassment. I do not remember Allied or anyone from Allied giving me any new employee orientation.
22. About a month after I was first hired, in 01/2022, one of the supervisors told me I needed to go to training for the Elite program. I remember the training was for

seven days. Part of the training was at a gun range somewhere by Sealy, Texas. The other part was at the Allied office on Interstate 45 in Houston.

**Allied Universal: pressures its Muslim officer to shave even after requests to keep the beard for religious purposes**

23. The first time I met Patrick Freeney was in that Elite training class on Interstate 45. He came in and introduced himself to the whole class. I remember learning he had just been hired with Allied not too long before that. He said he was the new account manager of the H-E-B account. He said he was our boss. After that he left. We continued the class.
24. This is an accurate copy of Patrick's email signature after he became my new manager and for the rest of the time that I worked for Allied.



25. Patrick Freeney was there going in and out, in and out. I believe he was supposed to take the training with us, but he never actually stayed for the training, he kept coming in and out. I remember specifically that he kept coming in and out because the instructor was trying to teach us and we kept getting interrupted when he would come in.
26. One time he came in and someone asked him a question. The person that asked a question was a Hispanic male with an accent. Patrick started making fun of him, and saying "duh duh duh duh duh." At the same time, Patrick picks up his hand and interrupted the guy, moving his hand like a doll that you would move the mouth with your hand. I remember Patrick didn't answer the question and just walked off.
27. I observed other people asking questions, and Patrick was not answering those questions either. I also asked a simple question. Patrick did not acknowledge my question. Patrick seemed to me to ignore my question and instead just kept talking. In my opinion, based on everything I saw and heard, it seemed like Patrick did not want to answer anybody's questions. In my opinion, from what I was observing,

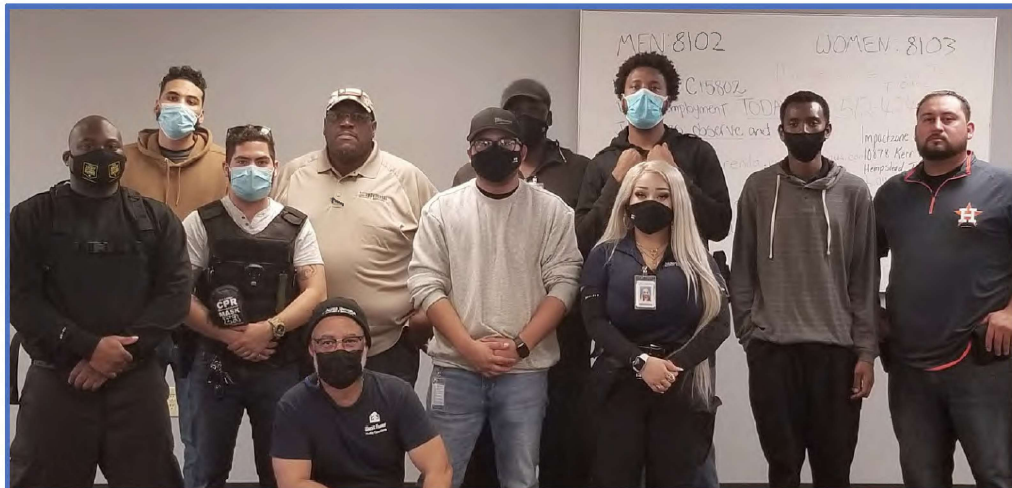
he was rude and disrespectful, and was ignoring questions. For example, if you were talking, he would cut you off right away and not answer the question.

28. During one of our fifteen minute breaks, I was standing by the door. I was wearing a facemask, so you couldn't really see my beard. Patrick came up to me and told me, "You need to shave your beard." I told him that I have my beard for religious purposes. He said something like, "it is policy to shave your beard." When I went to sit down, I asked Mauro Siboldi, a Hispanic Elite security officer that was in training with me, if they asked him to shave his beard. He said no. I told him that Patrick just told me to shave my beard.
29. Then when we were in class, and before the class started again, Supervisor Mauricio Zepeda came inside the room, and saw me, and told me, "You need to shave your beard." I turned around, looked at everybody, a lot of them had a beard. But I did not hear him tell anyone else that they needed to shave their beard. I said, "I have it because of a religious reason." He said something like, "it's a policy of the company." I thought it was weird that Patrick just told me the same thing, and then he comes in and tells me to shave my beard. My beard was trimmed up and clean. It was not messy.
30. This is a picture of me on the right and Monroe McClain, Allied's training instructor on the left. This is what my beard looked like during the training class. The picture is also attached as exhibit F.





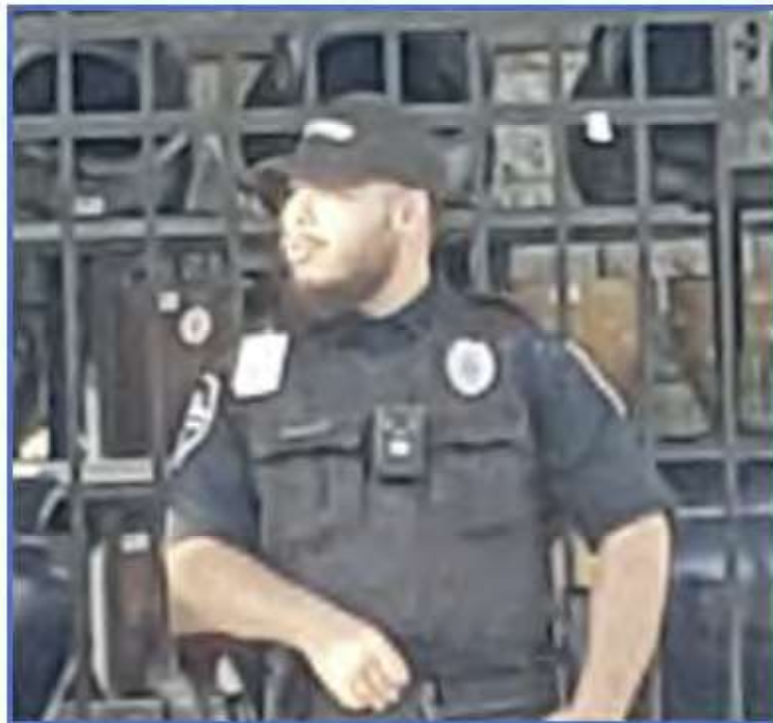
31. This is a picture of some of the people in my training class. I am not in the picture. If you look closely, even with masks on, you can see that many of the guys have beards. A copy of the picture is also attached as exhibit G.



32. After the Elite training class, a few weeks later, when it was still cold and still Winter, I was working at an H-E-B site on San Felipe Street and was told again that I needed to shave my beard. It was supervisor Mauricio Zepeda again. I had

already told him in the past that it was part of my religion. I told him again that I had a beard for a long time and it's part of my religious belief to have one. Zepeda told me "You need to shave your beard, it is policy of the company, you can't have facial hair."

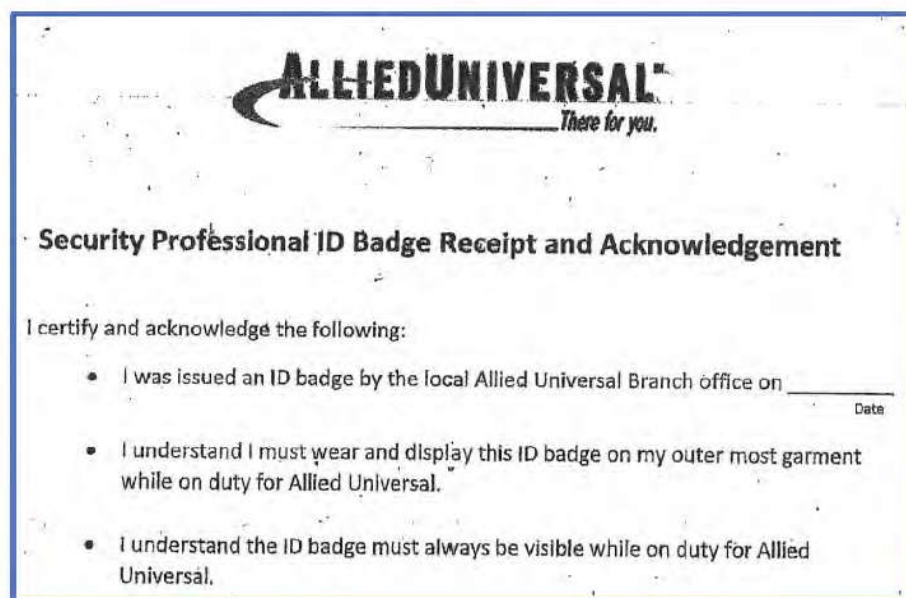
33. A day or two later I shaved my beard. I felt like I was missing a part of me. I felt like I had to shave to keep my job. I did not want to be fired for breaking a policy. It made me depressed. My beard has been with me for years. It hurt me and I felt like I was discriminated against. But I shaved it because I needed the job to take care of my family, and I needed the money. I felt like I had to do what I had to do to keep my family fed and myself fed.
34. After that, I was switching posts one day at the H-E-B on San Felipe Street in Houston. A Hispanic male with a beard around eight to twelve inches long was there working, and I was relieving him—he was an Allied Elite Security Officer too. I asked him, hey did they ever tell you to shave your beard? He laughed and said something like, "no, no one told me to shave."
35. I've seen other Allied Elite Security Officers with beards, also with longer beards than mine. Here is a picture that I took of one of them. It is also attached as exhibit H.



36. No one from Allied ever told me I could keep my beard with a religious accommodation.

**Allied Universal: withholds equipment from its Middle-Eastern, Muslim, Iraqi officer that others are issued.**

37. I understand that Allied says they did not treat me differently than other security guards because of my religion, national origin, or race. Besides making me shave my beard and not telling other security officers to shave, these are more examples of ways that I was treated differently than other security officers that were not Muslim, Middle Eastern-Kurdish, from Iraq:
38. I know now that one of the forms that I signed during the hiring event was this ID badge receipt form. A copy of the form is attached as exhibit I.



**ALLIEDUNIVERSAL**  
There for you.

**Security Professional ID Badge Receipt and Acknowledgement**

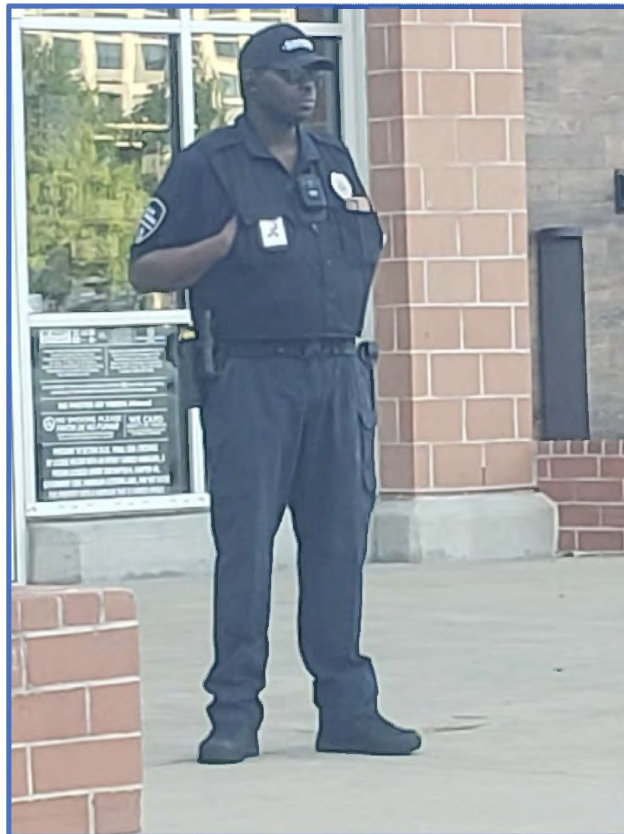
I certify and acknowledge the following:

- I was issued an ID badge by the local Allied Universal Branch office on \_\_\_\_\_ Date
- I understand I must wear and display this ID badge on my outer most garment while on duty for Allied Universal.
- I understand the ID badge must always be visible while on duty for Allied Universal.

39. Allied never gave me an ID badge. They never gave me an Allied metal badge or an Allied photo ID card, which was a required part of the Elite uniform. I saw many Elite security guards with these equipments. Some were Hispanic males, or white males, and some were Black males.
40. While I was working for Allied, I asked my supervisors for a badge and an Allied photo ID card at least ten times. I was told something like “they don’t have any more cards, that is why you don’t have one. “Or they would say “you’ll get it later on.” But I know that is not true, because I saw people at some of the posts where I worked that had photo ID cards. When I asked those people when they were hired, I learned they were hired after me. I was also at the office on Interstate 45

one day and I had asked one of my supervisors, when am I gonna get my picture ID card? He said something like, “we don’t have the cards.” As I was walking out to leave the office, I saw a Black, thin, short- haired male Allied security guard picking up a picture ID card. The receptionist was giving it to him. I saw her printing out the ID card.

41. Supervisor Zepeda came to the H-E-B on San Felipe Street in Houston while I was in the field a few times. I would ask him, “when am I going to get my proper equipment, I don’t have a metal badge, I don’t have a body camera. When am I going to get my stuff?” He said something like, “don’t worry about it, you’ll get it.” I’ve seen many officers with body cameras, Allied ID’s and Allied metal badges out in the field. The Black officers in exhibits H and J also have them. And Raymond Rodriguez, a Hispanic male working for Allied as an Elite security officer had them.
42. The uniform I got was not the correct uniform. Allied gave me a yellow shirt and black pants. Elite officers are supposed to wear navy blue. Below is a picture of what the Elite uniform looks like. It is also attached as exhibit J.





43. Below is an accurate picture of the shirt that Allied gave to me. I was also not given an Allied jacket.



44. I wear size small. The shirt that Allied gave to me was about four times my size. The pants that Allied gave to me were about three times my size. They were really long and from the stomach area they were really wide. I was not able to wear them. I told Allied the pants and shirt were not my size. They said just put them on, we need you to work today. That is all we have for now. After I had been working in the field, I saw people working in the field that were hired after me that were getting the navy colored uniform. To my knowledge, they were not Kurdish, or Muslim, or from Iraq.
45. I was also given equipments that was broken or didn't work. I was issued a gun and a Taser that didn't work, when the other officers got guns and Tasers that worked.
46. Allied knew that my gun was broken. When we trained at the gun range for a few days. One of the final days of training at the gun range everyone had to shoot targets to qualify, like a test. Monroe, Allied's instructor gave us the ammo. Each of us had to shoot a certain number of rounds. We were lined up to shoot the targets. And every time I pressed the trigger; my gun would malfunction. It would fire the first round, and the casing was supposed to eject, but it would get stuck in the barrel, so the second round could not reload in the gun. And then I had to clear it—take the magazine out and pull the slide to the back to make sure the casing would eject, and then re-load the gun and shoot again. And it would jam again. The entire time the gun was jamming. Everyone else was shooting. Some of the guys that were with me, they had never shot a gun before, never held a gun before, and they qualified—passed the test way ahead of me.

47. I told Monroe, that my gun was not working, it was malfunctioning. We went all the way to the back, we put CLP gun oil on it, and went back to shoot again. And the gun jammed again. One of the guys was right next to me. He even told me he never shot a gun and had the least experience. He pointed the gun at my feet and I had to say loudly at him, “hey man you’re pointing the gun at my feet.” He qualified way ahead of me.
48. We had to go to the back again. Monroe took the gun apart. He took the barrel out, and took the spring out. He said, something like “I know what’s wrong with it, the spring is bent. We can replace it for you later on. I’m gonna give you a different gun to qualify with.” I took a different gun and I qualified right away.
49. This picture below was taken after I qualified. It is also attached as exhibit K. You can see that there are two scores marked on the paper. One of the scores is crossed out. I was not hitting the targets because the gun kept jamming on me. I had to do the test again with the borrowed gun and then qualified right away. The second score that is not crossed out is the score I got with the borrowed gun.



50. Monroe took his gun back and gave me the broken one. The broken gun is the gun that I had to use for the rest of the time that I was working for Allied.

51. I am familiar with guns and I think Allied never should have let anyone go to work with that gun because it was in such bad condition. Not too long after that training I told my supervisor, my gun is not working, I need a new one. He said something like, “we’re gonna look into it.”
52. One time I went to the Allied office on 45 and I gave Monroe a gift. Traditionally, in Islam, you give sweets to show appreciation. I gave Monroe and Catherine Barnes some Baklava. When I was there, I told Monroe, “Hey, I still have my same gun, the one that is not working.” Monroe said something like, “Let me see what I can do.” The whole time I was working with Allied, Allied never gave me a new gun.
53. Allied Supervisor Zepeda was the one that gave me a Taser that same day that he told me to shave my beard. It was when I was in the field at the H-E-B on San Felipe Street in Houston. It was the second shift, the evening shift. Zepeda took me a Taser. I tested it in the field by taking the cartridge out—you flip the safety on it, and you press the trigger. I did that test and it was not working. I told Zepeda, this thing is not working. He said, “Yeah, it’s dead. Just have it on you for the look of it, so they can see you carrying one.” I know that other Elite officers, including Raymond Rodriguez, a Hispanic male had working Tasers.
54. I remember I was freezing. It was cold. It was winter. I had seen people working that I relieved wearing an Allied issued jacket. That day I asked Zepeda for a beanie and a jacket. He was driving a gray dodge car. He said, “we don’t have any.” When he opened the trunk, I noticed there were a bunch of jackets in there.

**Allied Universal: Client Manager Patrick Freeney initial harassment—racial/xenophobic remarks, physical threats**

55. Sometime in 01/2021, Allied Supervisor Alex Bergeron called me saying he had extras hours for me to work, and asked if I was willing to take it. And I said yes to him. I told him, send me the location, time and date, and all the information. The post was at an H-E-B store like 45-50 minute drive away from me. It was outside of Houston. I go there early in the morning. Before I got out of my car, I drive around, drive around, looking for the Allied patrol car. I don’t see a patrol car. I get out, go inside the store, looking to see if there was a security guard. I didn’t see anyone. So, I decide to call Alex. Alex was off work on that day. I said, “Hey Alex, I’m here at the post, I’m looking for the patrol car, I don’t’ see one. This is the day you told me to be here, and the location.” He said, something like “I got no time, it is my day off, go ahead and leave and we will pay you for the time driving.” I got frustrated because I drove all the way over there for nothing. So, I picked up

the phone and I called Patrick Freeney and I explained everything to Patrick. I told him what exactly happened. And I sent him a picture of the schedule. Patrick told me to go ahead and leave, and he will get to the bottom of what was going on and he will get back with me. I left and didn't hear back from Patrick.

56. A few days later one of the supervisors, either Mauricio Zepeda or Nathan Hernandez, called me and said, something like "why didn't you show up to work, you missed a date." And I said, "what are you talking about? I never missed a date." They said, "you agreed to a shift and you never showed up." I said "that's not right," and I showed them that I had no text messages from Supervisor Alex showing I should work.
57. Then Patrick Freeney called me and told me I needed to show up at the office. When I arrived at the office, I texted Patrick to let him know I was there. This is an accurate picture of that text message. It is also attached as exhibit L.



58. Patrick came and got me and took me to his office. And he starts telling me, "Why did you miss a day?" I told him I didn't miss any day. He was getting very argumentative with me, and very confrontational. I was trying to explain to him what happened exactly. In my opinion, from observing how he was acting with me, he didn't want to listen to me. He kept cutting me off and talking over me. And I was like, "I have the text messages that prove I went to the post. I called you and told you what happened that particular day. You were supposed to get back with me and you never did." And I said, "you can't listen to one side of the story, you need



to listen to both sides of the story. You need to bring Alex in here and listen to both of us at the same time.” Then he starts yelling in a loud voice, “this is America, we run things different, not like where you come from. Thing’s don’t get run like that over here.” I was shocked and at the same time I was scared. I was struggling to get the right words out, and sometimes I stutter when I speak English, because of the accent. Patrick started making fun of my accent and said, “duh duh duh duh duh, keep talking, keep talking.” The way he said it made me feel like it was a threat to me if I keep talking. Then he said something like, “If you are lying to me, I’m gonna fry you like a fucking chicken.” He goes, “if you’re lying, I’m gonna destroy your fucking life. He was not saying it like a joke. He was saying it like a threat to me. And I felt like he was saying very discriminatory things to me, telling me that this is not where I am from, that this is America.

59. Then he said something like, “You’re gonna be hearing from me.” But I never heard back from him. I guess he realized I was correct. He never called or texted me and never apologized for what he did to me in the office.

**Allied Universal: does not investigate or otherwise address report of discrimination**

60. When I left Patrick’s office that day I ran into Catherine Barnes. She wanted me to fill out some paperwork. She said that I was missing a paper. It turned out it was the same Texas licensing paper for the Texas Department of Public Safety that I had already filled out twice before. The same form that is attached as exhibit C. I told her, “I did this paper twice. This is the third time I do it.” I filled it out again and then I asked her for help. I told her, “I have been asking for overtime and more hours because I am in a bad spot for money. I really need to work and I don’t mind anywhere, if you can help me with that.” Then I told her, “I wanted to say, I think I’m being discriminated against by my account manager. The way he’s talking to me and the way he’s taking hours away from me. I’m losing a lot of overtime. Because in the beginning when I started working with Allied, I was getting a lot of overtime. But since Patrick became the account manager, things have changed around me.” She did not respond. All she ever said was “just sign.”
61. I believe that Catherine Barnes told Patrick what I said. Thinking back, I remember seeing them before in the office laughing and talking together, like they were good friends.
62. I was shocked and scared after that. I got very depressed. This is when I started pulling my hairs out, from being so depressed. I still have scars from that. It

affected my work. I knew based on everything that happened that any small mistake or anything I did, Patrick was watching me. In my opinion he was targeting me.

### **Allied Universal: Patrick Freeney's retaliation**

63. About a month or so later, I was talking with Monroe, my Elite training instructor, and explaining to him that I needed overtime hours. I had heard that there are different account managers at Allied and Security Officers are able to work with different accounts. I asked Monroe if he knew anyone, so that he could help me out. Monroe told me he would check and get back with me. Monroe later said he would help me out and talked with Ms. Travis, who was the account manager with the City of Houston. This was still an Allied job, but it would be under a different account manager.
64. Attached as exhibit M is an accurate copy of the text messages I had with Monroe about me working the City of Houston Allied account with Ms. Travis.
65. I remember talking to Ms. Travis and she said, I have 12 hour shifts with City of Houston. It was in a parking lot. She told me you cannot use your Elite equipment, like the Elite Taser. She said I would need to use my own equipment. She said, something like, "since you would be working with me too, I need to talk to your account manager to get permission from him. I would pay the overtime difference" My account manager was Patrick Freeney at that time. She got back with me later on and said, "He didn't give permission." Patrick didn't approve it. I felt like Patrick was blocking me specifically from getting overtime. Based on what I observed, I knew that other officers were allowed to work on different accounts and got Patrick's approval. In my opinion I was being targeted by Patrick.
66. On 3/19/2022, I was working at the H-E-B on San Felipe Street in Houston and I remember it was evening time. As I was patrolling, I saw someone passed out drunk on the property of H-E-B, on the sidewalk close to the street. The H-E-B manager, Meredith Rodriguez called me. She said she had people stealing in the store and she needs my help. I told her I have someone passed out over here near the store, I'm not sure what is wrong with him. Afterwards she told me she recognized him.
67. I walked over to help the manager and I saw there were two Hispanic males. One of them came towards me in the parking lot and we were near a car, he kept coming towards me and I was getting close to being pushed up against the car. The man grabbed my hands and we started struggling. Another manager, a male came and

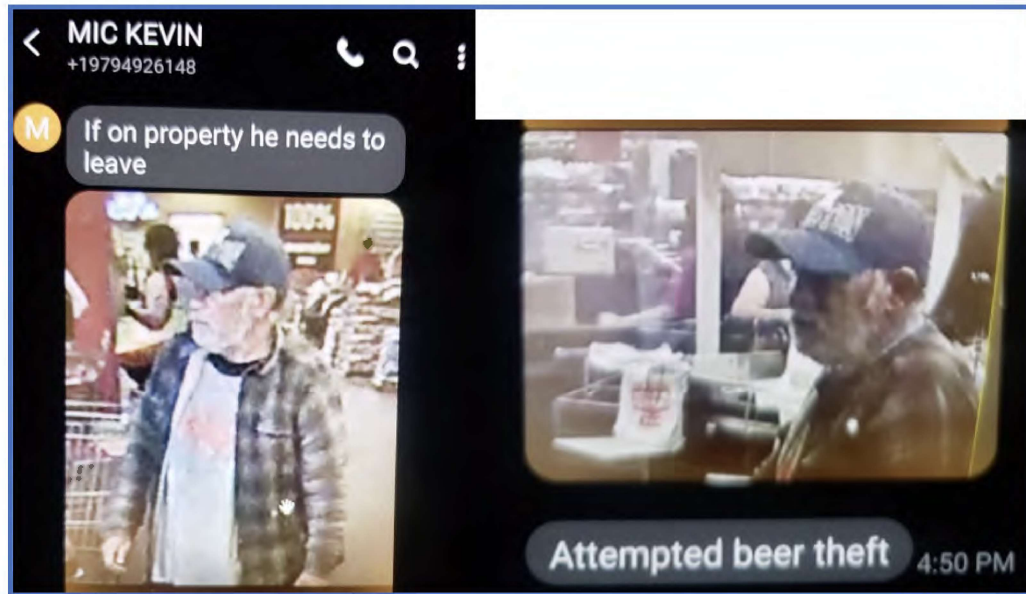
helped me out. The manager pushed the guy off of me. The two Hispanic males were getting very aggressive. Houston Police Department came, and the ambulance came. The ambulance checked them out, and found out that there was nothing medically wrong with them, just that they were drunk out of control. I understand that they got arrested for theft and trespassing, and they were told that they had been trespassing, and they were not allowed to come back to that property or any other property owned by H-E-B, because that was not the first time that they were stealing from that particular store. The H-E-B manager told the police they had just been stealing from the same H-E-B store the day before. After that the manager told me, thank you for what you did, you did a great job, making sure you had everything under control. I did not hear from Allied. I did not hear anything, but it was kind of weird, because a supervisor showed up. I asked him, are you here for the incident? He said, I don't know what incident you're talking about, but don't worry about it. I told him there were a couple of guys that got arrested and they went to jail. He didn't talk to anyone or do anything about it. I asked him if I needed to fill anything out. He said, no.

68. This an accurate picture of the two guys that were arrested on 3/19/2022. A copy is also attached as exhibit N.

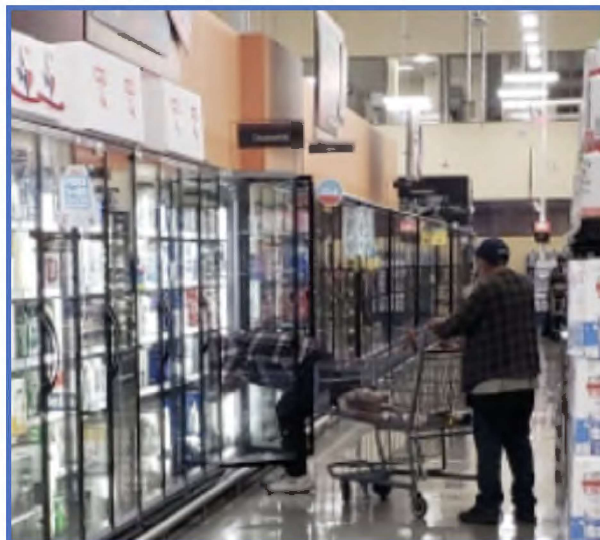


The police records also attached in exhibit N provide an accurate account of what happened that day.

69. On 4/4/ 2022, I was working at the H-E-B in Bellaire, Texas. I was patrolling the property in the Allied patrol car. And the H-E-B manager, Kevin texted me a couple of pictures. He texted them to the site phone. This is a screenshot of those text messages. They are also attached as exhibit O.



70. Then the H-E-B manager Keven starts calling over and over on the site phone He said something like, “they are back on the property, I have kicked them out already and they are back in the store again.” He said “they are still inside the store.” I went to the second floor and I walked inside the store, and saw Kevin, the H-E-B manager. He gave me directions to where exactly they were. So, I went there and took pictures of them. They were loading their carts with beer, wine, and meat or food. This is a picture that I took of them that day. It is also attached as exhibit P.





71. I immediately recognized the guys from the encounter I had with them at the H-E-B on San Felipe Street in Houston. I remember that they were very violent from that encounter with them before when they were arrested. And I knew they were not supposed to step foot on H-E-B property. They had a criminal trespass warning. They were the same guys that had just been arrested on 3/19/2022 at the H-E-B on San Felipe Street. They are a team of three working together but this day they were a team of two.
72. The H-E-B manager Kevin asked me, "do you want me to call the police?" I said yes, if you want to, call them. The manager then called the police. So I went by the door, close to the door area. The manager was about 20 feet away from me. He said, "stop them, don't let them leave with the merchandise." I believe one of the guys had already left the store. There was just one left and he was pushing the shopping cart. He walked around the cashiers and went to exit the store.
73. When he came toward me, I told the guy, "Hey, you need to go back to the register and pay for the merchandise that you have." The guy came at me with the shopping cart. I put my hand out and stopped the cart so I would not get hit with it. Then I said again, "you need to go back and pay for the merchandise. Go back behind the register." His tone completely changed and his eyes start opening up and looked angry and very red. The next part happened in a matter of seconds. He said, "move out of my way. I'm gonna cut you up, I have a knife on me." He was aggressive and hostile. He smelled very strong of alcohol. He seemed 100% drunk. And he seemed not in a right state of mind. I looked to his sides to observe anything sharp on him he might grab, and I saw by his right side of his jacket it did not look normal. I saw something shiny and I thought I saw a knife. I was scared that he was going to cut me. He appeared to me to be not in full mental capacity to be in the public. He seemed to me completely drunk out of his mind. I was worried for my safety and the safety of everyone else on the property. At the same time, I was not sure what he would do because he seemed so drunk. He could hurt me or himself, or anyone else around him. I quickly went around him and I started to put one handcuff on him. I did not handcuff him completely. He was fighting me with the other hand. Then the police arrived and said we are taking over. The police finished putting the handcuffs on, using my handcuffs.
74. The police officers did not ask me for a statement or question me at all. The police asked, where is the merchandise, and how much was it? The manager brought the amount to them. The police officer looked at it and asked, "do you want to press charges?" The manager said "no." The police officer said something like, "well they are going to jail anyway for public intoxication." They arrested him for public

intoxication. I saw they had already arrested the other guy as well. I remember seeing him handcuffed behind the police car. To my knowledge, the police did not review anything like camera footage. It happened so quick; the police didn't go inside the store completely. The police left with my handcuffs. A couple hours later they came back and gave me the cuffs back. They quickly came and handed me the cuffs and then left. I went back to working and everything went back to normal until Allied Supervisor Alex Bergeron showed up.

75. Alex showed up a few hours after the guys were arrested. I was downstairs in the patrol car when I saw Alex in an Allied patrol car in the parking lot. It looked like he had just gotten there. I did not see him ever go inside the store to talk to anyone. We both got out of the car and were standing in the parking lot. When Alex showed up he said, something like "you handcuffed somebody. You need to write a statement of what happened. He handed me the paper and I told him I write very slowly. I was trying to tell him everything that happened. I explained everything to Alex, including that the manager called me inside the store, I tried to show him the pictures. He wouldn't look at them. It seemed like he didn't want to look at anything or listen to me. Based on what I observed, it is my opinion that Alex just wanted to get out of there. I told him, "The guy threatened me. He made a threat toward me and he said he had a knife and he was gonna cut me up. I took it seriously." It seemed like Alex did not want to listen to my side of the story. Because he did not seem to be paying attention to me. As I was trying to talk to him, he was on his personal phone looking at something. He said something like, "Yeah, yeah, I understand." It seemed like Alex was in a rush. He told me something like, "you're taking too long, hurry up." I do not write in English very fast. Usually when I write something in English I have to translate it on my phone. So, it was taking me a long time. In my opinion he was super impatient and didn't want to wait. He said something like, "don't worry about it, you don't have to finish it. Give me the paper. You need to go see Patrick tomorrow at the office in the morning. The decision has already been made." That's when I told him, "I have to work tomorrow. He said, "no, you have the day off." He took the paper and left.
76. After Alex left, I stayed working and finished my shift, which ended when the store closed, at around 11pm. Sometime before the end of my shift I tried to write a report on my phone. I got into my phone notes app and spoke into the microphone and it converted what I said into the note attached as exhibit Q.

#### **Allied Universal: Patrick Freeney's retaliation and discrimination continue**

77. The next day, on 4/5/2022, I went to see Patrick Freeney at the Allied office on Interstate 45. I told the receptionist when I got there that I was there to see Patrick.

Patrick texted me saying he would be out to get me after his meeting. An accurate screenshot of that text message is attached as exhibit R.

78. Patrick came and got me and we went into the office. He shut the door. We were sitting down. And he had his foot up against the table and he was rocking his chair. He had a statement there typed up by a computer. It was not a hand-written statement. There was a metal steel pen right next to the paper ready for me to sign.
79. Patrick said, you need to sign this document. I asked, what is this? He said, this is a statement about what happened. I said, the statement should be written by me. And that's when he flipped. The statement was not right. It said I got out of my patrol car and approached the man for no reason and then pushed and handcuffed him. It is not true.
80. I tried to show Patrick the note on my phone. He told me "I don't want to see anything." He said something like, "this is what happened, (pointing to the typed statement), are you refusing to sign it?" He never looked at my statement on my phone. I told Patrick, "That guy threatened me." He said something like, "I don't want to listen to that bull-shit. I don't care what happened. You need to sign this form." And I said, "this is not what happened. You were not there, I was there. You didn't hear what happened. I did. I was there. It happened to me." I told him, "I didn't write this paper that you are trying to make me sign." One of the things that the paper said was that I acted alone without the manager telling me what to do. Which was not true. The manager told me to go into the store. I asked him to correct it. He said, you need to sign this paper, and he started yelling at me.
81. He yelled, "I don't give a fuck what happened or what you did or what you didn't do. You are a loose cannon. I am gonna make sure your license is taken away." At the time I thought he had authority to do that. I was really scared. He started telling me he would press charges on me and put me in jail. He said, "I'm gonna destroy your life. I will destroy you and fry you like a fucking chicken. If you don't like it, go back to where you came from." He said "you are suspended until the outcome of the investigation. How did your dumbass work for the military? You need to come back tomorrow and turn in your equipment." This made me feel like I was nothing. I thought how I was willing to sacrifice myself to serve this country, when so many other Americans are not willing to do the same, and still I'm treated like this?

**Allied Universal: continued retaliation and harassment—racial slurs, physical threats**

82. I went back the next day on 4/6/2022 to turn in my equipment, the gun and the Taser. Same as the day before, I checked in with the receptionist and Patrick came out and grabbed me. He was on the phone. He had like headphones on and he was talking to someone on the phone. We went into his office and he shut the door. As soon as I sit down, he told the person on the phone, "I've got to call you back, I'm dealing with a sand-nigger."
83. I gave him the Taser. He looked at it, he put it down. He opened the gun case. He didn't clear the gun or anything. He turned the gun toward me. I got freaked out. I moved the chair out to the side to be out of the way. I knew the gun was not loaded but it's a gun, you never trust a gun. You never know what's inside it. When he pointed the barrel toward me, he flipped the other side, and his finger was really close to the trigger. He looked at the serial number and wrote it down. The he just threw it back on the desk. I was shocked that he did that.
84. After Patrick threatened me with taking away my security license, or pressing charges on me, I was really scared about what he would do. I was worried about what Patrick would say if I left without a receipt to prove that I turned in my equipment. So, I asked him for a paper proving that I turned in my equipment. He got up and went somewhere. When he came back, I wanted to explain to him again about what happened to me. I told him that I needed to have the opportunity to fill out the report of what actually happened. He refused to give me that opportunity. He started yelling and talking over me. He said, "shut your fucking mouth and listen. You're not fucking listening to me." I got up and told him I needed to use the restroom. I got up and went to wash my hands and when I came back, I opened the door and I left the door open on purpose, to try to see if someone would hear what he was yelling at me. I think that I tried to open the door twice, but he got up both times and closed the door.
85. Patrick continued to berate me. In my opinion he was he was like a psychopath to me. And he was talking in an angry and aggressive tone of voice. I tried again to explain my situation but he would just talk over me and it felt to me like he was trying to intimidate me on purpose. Every time I tried to talk, he would go "no no no no, we're not doing this, shut your mouth and listen." He was disrespectful in ways that I've never seen in my life. He said again, "I'm gonna fry you like a chicken. This is not like where you come from. We run things different in this country. If you don't know how to survive over here, you need to go back to wherever you came from. Clearly you do not belong here."
86. I told him, "You are discriminating against me and you are attacking me." I asked if I could see somebody over him. His supervisor or someone like that. He turned

red and his eyes bulged out. You could see the white of his eyes come out. He had a metal pen down and he tossed it down. He said something like "I don't care what you say. Nobody wants to see your dumbass." He stopped filling out the equipment return forms. Then he went and grabbed more paperwork and he was writing the serial number down and counting the bullets. I would try to talk and he said, "No I don't want to listen to that bullshit. There is nothing coming out of your mouth I want to listen to." He said, "when the investigation's over, I'm gonna make sure you're gonna be fired. Even if you're not fire-able because I don't need somebody like you in this company."

87. Again I was having problems saying certain words. Again Patrick would make fun of me and go, "Duh duh duh duh. Keep talking keep talking. What you're saying, it doesn't make no sense to me." Every time I tried to say something he would tell me to shut up. "Just shut your fucking mouth."
88. All at the same time I didn't want to jeopardize my job. He was already threatening to press charges and jail me. I was trying to just swallow everything and deal with it. He says "You're suspended until the outcome of the investigation." I asked him "how long will that take?" He said, "I don't know, you will be hearing from me." I did not hear back from Patrick after that. No one from Allied ever contacted me to ask me for my statement of what happened or asked me to submit a full incident report.
89. Five days later, on 4/11/2022, I got an email from Catherine Barnes, the same Allied HR Coordinator that I had talked with before. Patrick Freeney was copied on the email. In the email Catherine was asking me to fill out the same form again, the Texas Security form from the DPS. This is what Catherine said in the email.

**From:** "Barnes, Catherine" <Catherine.Barnes@aus.com>  
**To:** "twana\_202020@yahoo.com" <twana\_202020@yahoo.com>  
**Cc:** "Freeney, Patrick" <Patrick.Freeney@aus.com>  
**Sent:** Mon, Apr 11, 2022 at 6:00 PM  
**Subject:** Allied Universal Security License

Good evening Ahmed,

We are emailing you due to missing documents needed for your security license affiliation, please complete the attachment by completing the applicant information section, acknowledgments, sign and date and return asap.



An accurate copy of the email is attached as S. Allied produced a copy of the email and the attachment, but it does not show the date. Allied's copy is also attached in exhibit S. It is the same email that I received on 4/11/2022.

**Allied Universal: does not respond to or investigate written report of discrimination**

90. I texted Catherine Barnes on 4/21/2022 asking her to call me at her earliest convenience. An accurate copy of that text message is attached as exhibit T. She did not call me or text me back.
91. Then I wrote back to Catherine Barnes on 4/25/2022. An accurate copy of my email is attached as exhibit U. This was my email to Catherine:

Hello Katherine this is Officer Ahmed I'm replying to your message in regards to this form I have completed this form 3 times previously I've filled it two times with you personally and once at the event at the hotel when I got hired. I wanted to let you know because I feel as though I am being discriminated against and I have been on suspension for over 2 week. I performed my duties to the best of my ability I did nothing wrong and have been under suspension for two weeks now.

I have been targeted by the account manager he has been rude to me he has stated to me Racial slurs and threatened me I have been silent under the risk of losing my job. He has pulled me into office doors closing the door behind them and threaten me on the property he said he will (fry) me and to go back to my country and that there is a certain way things go in this country not where I'm from he said. I am not aware if he has had problems with other Muslim employees but he has made it clear to me that he has a problem with me.

He made me shave my beard even after I told him I have to keep it for religious purposes and most recently he stated to me that he was going to make sure I get my license taken away from me and I'll never be able to work security for the rest of my life why he is threatening me like that I really don't know.

I've never missed a day I've never called in sick I have been a good employee and have considered the interests of the property and this company. I can't even get another job because I don't know if I'll lose this one. I do not want to leave this company it has treated me well other than patricks racism I wish to continue working for this company.

Please Catherine give me call back at your earliest convenience thank you.

92. Catherine did not respond to that email. I emailed her again on 5/6/2022 asking her to please respond. She responded on 5/9/2022 saying, "This is the first email I've received." I wrote back the next day asking her what the status of my suspension was, and I told her I had written about being targeted by a manager. The following are accurate copies of the emails we exchanged after that. All of these emails I had with Allied HR coordinator Catherine Barnes are attached as exhibit V.

On Tue, May 10, 2022 at 8:01 AM, Barnes, Catherine  
<[Catherine.Barnes@aus.com](mailto:Catherine.Barnes@aus.com)> wrote:

Good morning Twana,

I am unfamiliar with the suspension you are speaking of nor did I receive anything detailing your suspension. For further assistance please contact the AUS hotline for at 1-888-260-5948.

Best regards,  
**Catherine Barnes**  
Human Resources Coordinator  
Allied Universal  
11811 North Freeway | Suite #810 | Houston, TX 77060  
W: 832-786-3911 | [catherine.barnes@aus.com](mailto:catherine.barnes@aus.com)  
License # C15802



**From:** Twana Kaka <[twana\\_202020@yahoo.com](mailto:twana_202020@yahoo.com)>  
**Sent:** Wednesday, May 11, 2022 7:47 PM  
**To:** Barnes, Catherine <[Catherine.Barnes@aus.com](mailto:Catherine.Barnes@aus.com)>  
**Subject:** RE: RE:

Thank you for your response but why cant I receive information from don't you handle employee affairs and take complaints?

On Thu, May 12, 2022 at 8:11 AM, Barnes, Catherine  
<[Catherine.Barnes@aus.com](mailto:Catherine.Barnes@aus.com)> wrote:

Good morning,

No I do not.

Best regards,  
**Catherine Barnes**  
Human Resources Coordinator  
Allied Universal  
11811 North Freeway | Suite #810 | Houston, TX 77060  
W: 832-786-3911 | [catherine.barnes@aus.com](mailto:catherine.barnes@aus.com)  
License # C15802



**Allied Universal: never tells its employee he was fired, fails to protect him from retaliation**

93. After that, on 5/16/2022 I emailed Catherine Barnes again to ask her I was still employed by Allied or if I was still suspended or if I was fired. Catherine never responded to that email. An accurate copy of that email is attached as exhibit W.
94. This whole time I thought I was still suspended, and no one would answer my question about if I was still suspended or not. I looked up Allied and found a different address. I remembered that with Allied you are allowed to work for different accounts. I went to a different address, a different office location and I met Krystal Balanta, an Allied recruiter there. I told her my situation and I asked if she could help me out. And she said, we have a lot of open posts, I got plenty of posts and I can try to give you one and help you out, what is your social. I gave her my social. She typed it into the computer and she called someone from HR. Then she said, I emailed Katherine.
95. The next day, I got a text message from Krystal saying that I was not rehirable, and I needed to contact Katherine Alyea from HR. Attached as exhibit X is an accurate copy of that text message.
96. I emailed Katherine Alyea that same day, on 5/25/2022, and also called the hotline that same day to report what happened to me. The hotline person told me they would not write down everything, but just the most important things. Katherine told me to contact Wayne Oliver, an Allied HR Representative. A copy of those emails and the hotline summary are attached as exhibit Y.
97. I started talking to Wayne Oliver and reported everything that happened to me again on the phone. He also asked me to send an email, which was harder for me. I never was notified that the investigation was closed. Wayne Oliver contacted me and did his own investigation. We were talking in the summer. It was hot. We were talking on the phone. He said to me, something like "I believe that you got treated unfairly, but there is nothing I can do. I believe what you said to me." And he said "there is nothing that I can do. I believe what Patrick did to you. But there is nothing I can do about that; the decision has already been made from higher up."
98. I know that I followed Allied's use of force policy. We were instructed to use the proper force necessary for the threat. And the policy says you can use force to protect yourself or others from harm when there is a threat. A man I observed to be drunk out of his mind threatened to cut me with a knife and was being aggressive toward me. At the time I thought he had a knife on him. And he did not seem in a



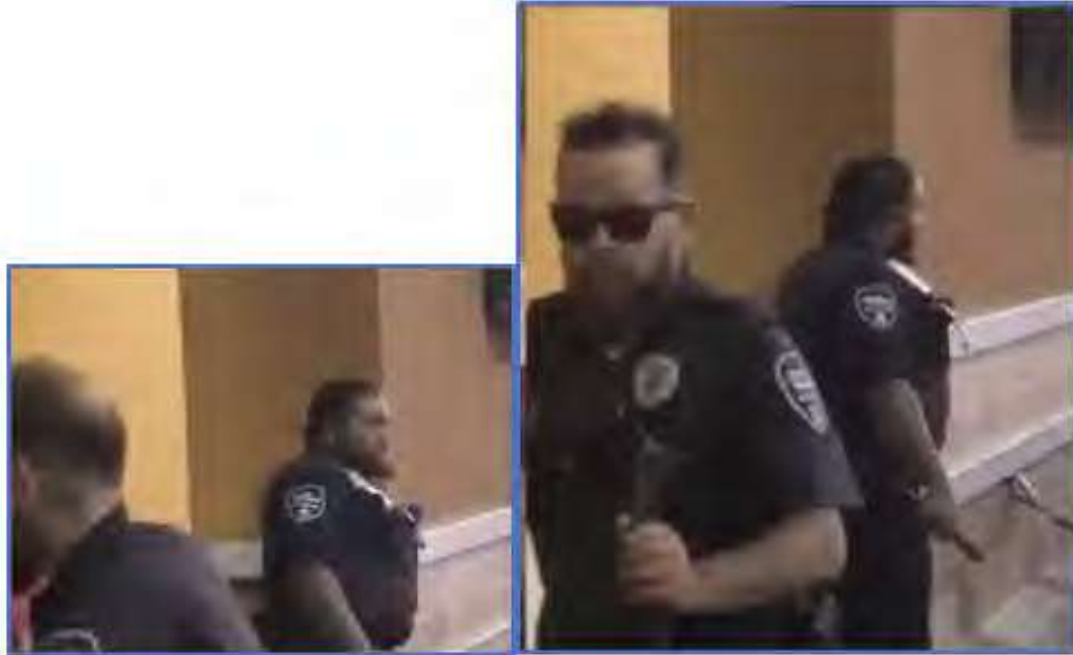
right state of mind based on the way he looked and was acting. I had a gun on me and a Taser. I did not use using those. I used the lowest amount of force I thought necessary for the threat. And no one was hurt. The man was never pushed on the ground or anything like that. I believe based on what I saw, heard, and observed from other security officers that have used force at Allied, that I was setup and targeted by Patrick Freeney. He promised he would to everything he could to get me fired, and he did it because he did not like who I am or where I am from, my religion and origin.

99. The whole situation made me lose ability to sleep. I lost some of my hair, and I was pulling my hairs out without even realizing. It still affects me today. I wake up in the middle of the night sometimes and I've went to a church that was close to me and just cried and cried. It wasn't a mosque but it was a place of worship, and it was close. I was drawn there to try to feel better. What Patrick did made me very depressed. Based on what I felt and sensed and heard Patrick Freeney say and do to me, it is my opinion that he has no care for me as a human being because of my religion and where I come from. He treats people badly, but he treated me worse. I felt like he had a target on me.

#### **Allied Universal: other security officers using force**

100. I met Raymond Rodriguez, at H-E-B on San Felipe Street in Houston. He was also an H-E-B Elite Security Officer under Patrick Freeney. I met him there when I was relieving him from a shift. We were friendly. I saw him carrying a knife. We were not supposed to carry a knife. You are also not supposed to carry a gun on your thigh, you are supposed to use the Allied Universal issued holster. Everything was supposed to be issued by Allied. He had his own stuff, his own equipment. I knew that was against policy.
101. One day, I went to the H-E-B on the corner of Kempwood Drive and Gessner Road in Houston to buy gasoline for my car. And I saw Raymond Rodriguez. He is a Hispanic male, working for Allied as an Elite Security Officer at that time. He brought up an incident that had just happened with him one or two days before with him. He told me that he had to use the Taser on somebody at the H-E-B gas station. The guy was a double-amputee. And he said he dropped him to the floor. I asked him, was the account manager notified? He said, yes, he was notified. He was on the phone with me. The reason I asked was because of the way Patrick acted with me using the handcuffs at H-E-B. I asked him if he recorded the incident, and he said, yeah, I recorded it on my body camera. He told me the guy was trying to break the glass.

102. A couple weeks later, I went back to buy gasoline at the same location. I saw a different Allied security guard. I asked him, hey have you seen Raymond? He told me, yeah, he had a problem going on. I asked what? He said, this time he dragged somebody off the shelf and out of the store. He said, he still works for the company. He didn't get fired or anything. He just got moved to a different account and doesn't work for the Elite account anymore.
103. After I found out that Allied said they have no incident report or use of force report for what Raymond did, I went to the police station to see if they had a report of Raymond's use of force. A copy of that report is attached as exhibit Z.
104. I listened to the 911 call linked on exhibit AA and I recognize Raymond's voice in that recording. The police reports and the transcripts of the 911 calls also match some of what Raymond told me happened to him when he had to pull the Taser on the double amputee. The calls and reports say Raymond tazed the man and put handcuffs on him. Those are attached on exhibit BB.
105. As far as I know, Allied did not even do a use of force report or incident report for what Raymond did. I did not even pull out my Taser and Allied suspended me and fired me. My opinion is that they were retaliating against me and targeting me.
106. I also saw on the news that an Allied security officer at a Kroger in Houston, who was working during the time that I worked for Allied, pepper sprayed and dragged a lady out of the store because he thought she was stealing. I saw the news report that he was still working there, not fired, two months after using pepper spray and dragging the lady. That news report is attached on exhibit CC.
107. The video linked on exhibit DD is video of a location where I worked as an Elite officer for Allied Universal. It is video of a Mi Tienda store on Little York Street in Houston. There is a white male and an African American Allied Elite officer. They are beating a man on the floor with batons and they kick him. I remember working at that location. It is in a big shopping center. I recognize the guards' uniforms in the video as the Elite Security Officer Uniform. They have the same navy uniform, with Allied badges and Allied ID cards. They also have body cameras, and the same type of Taser that the Elite officers are issued. If you look at the video closely, you can also see that both of the Allied Security officers have long beards. These are some screenshots of that video.



**Allied Universal: falsification of discipline and termination forms**

108. After I filed my Charge of Discrimination with the EEOC, after Allied sent their Position Statement to me, and months after my case was at the EEOC, that was the first time I ever saw the discipline forms attached as exhibit EE. I was shocked when I saw them. They are completely false and fake. Patrick Freeney never once came to meet me in the field. Not once. No one ever told me that my pants were dirty. I always wore black shoes. I always took care of my uniform. Everything was clear and clean. Always washed and laundered every time. And every time I met Patrick in his office, there were never any witnesses there. I never saw the form saying I was terminated. Patrick always told me I was suspended. I would have remembered this form. I would have noticed that it looks like it has two different colored inks on it.

**My name is Twana Ahmed. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my recollection. Executed on** Jan 21, 2025.

  
Twana Ahmed (Jan 21, 2025 20:06 CST)  
Twana Ahmed